

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 25-10658-WGY

DEFENDANTS' MOTION TO COMPEL THE DEPOSITION OF NADJE AL-ALI

Defendants respectfully request that the Court order plaintiffs to *immediately* produce Nadje Al-Ali for a deposition on July 3, 4, or 5. Ms. Al-Ali was originally scheduled for a deposition on July 2, 2025, but because of weather-related travel cancellations defendants are unable to depose Ms. Al-Ali on July 2 as originally planned. *See* Ex. A. Defendants have attempted to reschedule the deposition for July 3, 4, or 5, but plaintiffs have rebuffed those efforts. *See id.*

Ms. Al-Ali is a witness central to plaintiffs' case, and the only witness from their original complaint that they plan to call at trial. *See* Dkt. No. 172, Ex. A. It is imperative that defendants depose her before trial, which begins five days from now.

Accordingly, the Government respectfully requests that the Court order plaintiffs to make Ms. Al-Ali available for a deposition on July 3, 4, or 5.

Respectfully Submitted,

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Dated: July 2, 2025

Counsel for Defendants

MEET AND CONFER CERTIFICATION

In accordance with Local Rules 7.1(2) and 37.1, Government counsel have repeatedly emailed with counsel for the Plaintiffs in an attempt to find a mutually agreeable time for a deposition, but Plaintiffs' counsel has refused to make the deponent available on July 3, 4, and 5.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: July 2, 2025

U.S. Department of Justice

By: /s/ William Kanellis
WILLIAM KANELLIS